

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ELIEZER CRUZ APONTE, et al.,

Plaintiffs,

v.

CARIBBEAN PETROLEUM CORPORATION, et
al.,

Defendants.

CIVIL NO. 09-2092 (FAB)

This pleading applies to:
All actions consolidated under
Civ. No. 09-2092 (FAB)

NOTICE

TO THE HONORABLE COURT:

Come now Caribbean Petroleum Liquidation Trust ("CPLT"), as successor in interest to Caribbean Petroleum Corporation, Caribbean Petroleum Refining L.P., and Gulf Petroleum Refining (Puerto Rico) Corporation (collectively, the "Debtors"), and FTI Consulting, Inc., as liquidation trustee (the "Liquidation Trustee") of CPLT, by and through their undersigned counsel and very respectfully state and request:

1. On June 15, 2015, the Liquidation Trustee filed the "Motion of Caribbean Petroleum Liquidation Trustee for Entry of an Order (I) Amending Document Retention Policy and (II) Authorizing Destruction of Documents and Records" (the "Motion") in the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court") seeking entry of an order authorizing the Liquidation Trustee to destroy or otherwise dispose of any and all remaining hard-copy documents and records in its possession.

2. A formal notice of the Motion that was filed with the Bankruptcy Court is attached as **Exhibit A** (the "Notice"). A copy of the Motion is attached as **Exhibit B**.

3. As set forth in the Notice, a hearing to consider the Motion is currently scheduled to be held on July 6, 2015 at 9:00 a.m. (Eastern Standard Time) (the "Hearing Date") before

The Honorable Kevin Gross at the Bankruptcy Court, 824 North Market Street, 6th Floor, Courtroom 3, Wilmington, Delaware 19801. See Exhibit A.

4. Any responses or objections to the Motion must be filed pursuant to the Notice on or before June 29, 2015 at 4:00 p.m. (Eastern Standard Time) (the "Objection Deadline"). See Exhibit A.

5. The undersigned file this notice in these consolidated cases in order to notify all parties appearing in these consolidated cases of the filing of the Motion, the Hearing Date, and the Objection Deadline.

WHEREFORE, CPLT requests that the Court and all parties appearing in these consolidated matters take notice of the above and of **Exhibit A** and **Exhibit B**.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY: That today I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which shall automatically notify the parties' attorneys of record at their e-mail addresses and which pursuant to Local Civil Rule 5.1(b)(2) constitutes the equivalent of service.

In San Juan, Puerto Rico this 16th day of June 2015.

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